## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA ) v. Criminal No. 05-10003-NMG ARTHUR GIANELLI, JOSEPH YERARDI, JR., DENNIS ALBERTELLI A/K/A "FISH," SALVATORE RAMASCI A/K/A "LEFTY," RANDY ALBERTELLI, GISELE ALBERTELLI, RAFIA FEGHI A/K/A RAFIA YERARDI, TONY DANIELS A/K/A "SONNY," FRANK IACABONI, DEEB HOMSI, TODD WESTERMAN, ENEYDA GONZALEZ RODGRIGUEZ, and WESHTOD CONSULTANTS A/K/A WESHTOD CONSULTORES S.A. Defendants

## GOVERNMENT'S MOTION TO SEAL INDICTMENT

Pursuant to FRCP 6(e)(4), the United States of America, by Michael J. Sullivan, and Assistant U.S. Attorney, Michael L. Tabak, hereby moves this Court for an Order to direct that the indictment be sealed (and that no person shall disclose the return of the indictment except when necessary for the issuance and execution of a warrant) until the defendants are in custody in the above-captioned case and the Court has ordered the indictment unsealed.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By:

MICHAEL L. TABAK

Assistant U.S. Attorney

Date: April 7, 2005

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allowed